



Re: 284-West Powerhouse 

John Pavitt to: Dennis Faulk

03/06/2012 03:27 PM

Cc: Andrew Boyd, Dan Opalski, Jeff Kenknight, Melanie Garvey

Dennis, the pictures and your description show a project not in compliance with the asbestos NESHAP.

In general, the NESHAP requires all Regulated Asbestos Containing Material (RACM) to be removed prior to being disturbed. (See: 40 CFR 61.145(c)(1)) Some exceptions apply, but would not apply in this case.

For example, the regulations allow for the removal of facility components in units or sections when they still contain asbestos in the case of asbestos that is encased in concrete or similarly hard material, or when it was not accessible for testing and therefore not discovered until after demolition starts. (61.145(c)(1)(ii) and (iii))

Again, the overriding requirement is that all RACM be removed prior to being disturbed.

John Pavitt

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For Asbestos Information and FAQ's please see:

<http://yosemite.epa.gov/R10/OWCM.NSF/webpage/Asbestos+in+Demolition+and+Renovation>.

Dennis Faulk

All, Yesterday I was out on site walking down an...

03/06/2012 12:52:02 PM

From: Dennis Faulk/R10/USEPA/US
To: Dan Opalski/R10/USEPA/US@EPA, Andrew Boyd/R10/USEPA/US@EPA, Jeff Kenknight/R10/USEPA/US@EPA, John Pavitt/R10/USEPA/US@EPA, Melanie Garvey/DC/USEPA/US@EPA
Date: 03/06/2012 12:52 PM
Subject: 284-West Powerhouse

All,

Yesterday I was out on site walking down an asbestos job and two of the insulators that were assigned to the 284-W power house sat down and expressed concern with how the class I friable asbestos was handled on the boiler. In an identical facility in East area they removed all the asbestos on top of the boiler. As you can see from the first picture that is not the case here. The water cannon does not appear to be on and is not even pointed at the asbestos. The asbestos on top of this boiler is the chalky kind that easily disperses.



photo2841.JPG



photo2842.JPG